

LAW OFFICES OF
JEFFREY LICHTMAN
11 EAST 44TH STREET
SUITE 501
NEW YORK, NEW YORK 10017
www.jeffreylichtman.com

JEFFREY LICHTMAN
JEFFREY EINHORN
PAUL TOWNSEND

PH: (212) 581-1001
FX: (212) 581-4999

May 15, 2019

BY ECF & HAND DELIVERY

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Evans, et al., 17 CR 684 (ER)

Dear Judge Ramos:

A. INTRODUCTION

This letter is submitted on behalf of defendant Tony Bland in anticipation of his May 29, 2019 Sentencing. With this letter, the defendant respectfully requests that the Court impose a non-custodial sentence, which is both consistent with the recommendation of the Department of Probation and is “sufficient, but not greater than necessary to comply with the purposes” set forth in 18 U.S.C. § 3553(a)(2) due, in part, to the “nature and circumstances of the offense and the history and characteristics of the defendant.” 18 U.S.C. § 3553(a)(1). The basis for this request is as follows: *first*, the criminal conduct in this case appears to be a marked deviation from Mr. Bland’s otherwise law abiding life; *second*, multiple mitigating factors exist, including the defendant’s lesser role in the offense as compared to his codefendants and his extraordinarily difficult childhood, wherein he was exposed to violence and mental illness at home, and had a mother who was addicted to drugs and used crack cocaine in his presence; and *third*, Mr. Bland has lived a life full of good deeds and service to his community, and the prospects for his rehabilitation are very good.

**B. THE DEFENDANT’S GUILTY PLEA
AND RESULTING GUIDELINES RANGE**

On January 2, 2019, Mr. Bland pleaded guilty pursuant to a plea agreement to Count One of a nine-count Indictment which charged him with Conspiracy to Commit Federal Funds Bribery, in violation of 18 U.S.C. § 371 (Count One); Conspiracy to Commit Honest Services

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Wire Fraud, in violation of 18 U.S.C. § 1349 (Count Five); Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349 (Count Eight); and Conspiracy to Violate the Travel Act, in violation of 18 U.S.C. § 371 (Count Nine). See December 11, 2018 Plea Agreement (“Plea Agreement”) at p. 1. Mr. Bland faces no statutory minimum and a maximum term of five years imprisonment. Id.

As recounted in the Presentence Investigation Report (“PSR”), U.S.S.G. § 2X1.1 applies to Count One of the Indictment. PSR at ¶ 91. Pursuant to § 2X1.1(a), § 2C1.1 is cross-referenced, which sets the base offense level at 12. U.S.S.G. § 2C1.1(a)(2). Id. With no enhancements for specific offense characteristics (PSR at ¶ 92) and two levels subtracted for acceptance of responsibility (§ 3E1.1), the total offense level is 10, carrying an advisory sentencing range in the Criminal History Category I of 6 to 12 months imprisonment. PSR at ¶ 143. Further, because this range falls within Zone B of the Sentencing Table, the minimum term may instead be satisfied by: a) a sentence of imprisonment that includes a term of supervised release with a condition that substitutes community confinement or home detention according to the schedule found in U.S.S.G. § 5C1.1(e) so long as at least one month is satisfied by imprisonment; or b) a sentence of probation that includes a condition or combination of conditions that substitute intermittent confinement, community confinement, or home detention for imprisonment, according to this same schedule. PSR at ¶ 143; U.S.S.G. § 5C1.1(c).

**C. THE DEFENDANT’S BACKGROUND
AND THE NATURE OF THE OFFENSE –
APPLICATION OF § 3553(a) FACTORS**

Since the Supreme Court’s decision in United States v. Booker, 543 U.S. 220 (2005), the Sentencing Guidelines have been rendered advisory in nature, leaving sentences to the district court’s discretion, guided by the Guidelines and the other factors contained within 18 U.S.C. § 3553(a) and bounded by any applicable statutory minimum and maximum. This Section directs sentencing courts to “impose a sentence” that is “sufficient, but not greater than necessary, to comply with” the “need for the sentence ... to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; to afford adequate deterrence to criminal conduct; [and] to protect the public from further crimes of the defendant” 18 U.S.C. § 3553(a)(1)-(2) (emphasis supplied). In making this determination, courts are to consider “the nature and circumstances of the offense and the history and characteristics of the defendant” 18 U.S.C. § 3553(a)(1).

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Mr. Bland's Role in the Offense

Of all the defendants charged in the investigation of crimes involving college basketball, there can be no question that Tony Bland is the least culpable. In addition, we think it fair to suggest that the University of Southern California ("USC") is not the usual crime victim in a typical federal bribery or fraud case.

First, of the three indictments that resulted from the government's investigation, the worst actors were former Adidas executive James Gatto, as well as Christian Dawkins, and Merl Code. The three were tried together before Judge Kaplan, found guilty of brokering a pay for play scandal involving a \$100,000 bribe to the father of a basketball recruit, as well as arranging other deals to steer prospective student athletes to certain universities. For his crimes, Gatto received a sentence of only nine months imprisonment; Dawkins and Code received sentences of just six months imprisonment.

Second, among the coaches charged in this Indictment, the government has agreed that Mr. Bland is the least culpable as he accepted just \$4,100 in a single bribe. Notably, this is both less money and fewer bribe payments than accepted by Emanuel Richardson, who received two bribes totaling \$20,000, and Lamont Evans, who accepted many smaller bribes totaling \$22,000. See PSR at ¶¶ 51, 56-59. Dawkins and Code, who were indicted with these coaches and convicted after a trial before Your Honor on charges of running the bribery conspiracy obviously bear more responsibility.

Third, Mr. Bland is also less culpable than Chuck Person and Rashan Michel, who were indicted together in a case pending before Judge Preska. Person pleaded guilty to accepting \$91,500 in multiple bribes, and Michel acknowledged accepting \$24,000 in payments for, *inter alia*, his efforts to facilitate bribes paid to Person. The total amounts and number of bribes far outweigh Mr. Bland's.

Fourth, while Mr. Bland pleaded guilty to conspiracy to commit bribery by agreeing to accept payments in exchange for "directing [USC] basketball players to retain certain ... advisors," (Plea Agreement at p. 1) USC can hardly be viewed as a traditional victim of a bribery conspiracy. Indeed, the outcome of the most recent trial of Dawkins and Code suggests that at least one jury agrees that the universities at issue were not victims of this scheme: the jurors rejected all counts premised on the government's honest services fraud theory of prosecution. Specifically, the jury acquitted Code and Dawkins of Count Three, which alleged a general conspiracy to commit honest services wire fraud, Count Four, which alleged honest services wire fraud as it applied to University of South Carolina and Oklahoma State University, and Count

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Five, which alleged honest services wire fraud as it applied to the University of Arizona.¹ Additionally, in what was described in the media as “unseemly,” just six months after Mr. Bland was charged in this case, USC hired the father of hotly recruited high school basketball stars Isaiah and Evan Mobley to fill Mr. Bland’s vacant coaching spot in order to secure their attendance at the school. As noted in USA Today, the hiring of the Mobleys’ father certainly appears to be a bribe:

If you find it ironic that Bland was pushed out for a sense of ethical toxicity only to be replaced by a man whose appointment is considered ethically questionable (if completely within the realm of NCAA regulations), well, there’s something to that.

Cam Smith, USC’s hiring of Eric Mobley opens up the floodgates for ethical criticism, USA Today, March 26, 2018, available at: <https://usatodayhss.com/2018/eric-mobley-usc-coach> (last viewed May 15, 2019).

Finally, the non-custodial sentence that we seek is therefore consistent with both Mr. Bland’s characterization as the least culpable defendant and the fact that the worst actors – Gatto, Dawkins and Code – received sentences of nine months, six months, and six months, respectfully, after being convicted following an October 2018 trial in a related bribery scheme. See 18 U.S.C. § 3553(a)(6) (courts are to consider “the need to avoid unwarranted sentencing disparities among defendants with similar records who have been found guilty of similar conduct”).

The History and Characteristics of the Defendant

We have attached over 20 character letters in support of this submission, reflecting the significant and meaningful role that Mr. Bland has played in lives of friends, family members and recipients of his generosity. It would be impossible to include a letter from every individual whom the defendant has positively influenced. Still, the myriad letters on which we remark paint a consistent picture of “man of great character, determination and compassion,” (April 7, 2019 Letter of Patsy Armstrong, attached as Exhibit 1) who is “respectful, hardworking and disciplined,” (March 11, 2019 Letter of Dr. Brenda Henry-Offor, attached as Exhibit 2) and a “[s]ource of inspiration” to many. March 22, 2019 Letter of Amir Gresham, attached as Exhibit 3; see also Letter of Joyce Bland Gresham, attached as Exhibit 4 (“a good and decent person ... a

¹ Dawkins and Code were also acquitted of Count Six, which charged a Travel Act conspiracy.

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gentle spirit ... very kind and considerate to others”). Sadly, were it not for this sentencing, many of Mr. Bland’s exceptionally good deeds probably would have gone unrecognized.

Mr. Bland’s Extraordinarily Difficult Childhood and Efforts to Escape Poverty

As observed in the PSR and recounted in several of the submitted letters, Mr. Bland was subjected to a litany of traumatic incidents during his childhood. Primarily raised by his paternal grandparents in the notoriously tough Watts neighborhood of Los Angeles, Mr. Bland’s mother was only 14 years old when she gave birth to him – and her parents disowned her on account of his birth. PSR at ¶ 110. With nowhere else to turn and hopelessly addicted to crack cocaine, she left Tony with his grandparents – coming and going from the house as she pleased. When she was home, she used drugs around him – and when he was just eight years old, she brought him to a crack house to purchase narcotics. PSR at ¶ 112. There was very little stability in the tiny one bedroom home as “multiple people,” including aunts and cousins would stay there for short periods of time and his grandfather’s small military pension did not provide enough to feed everyone. *Id.* at ¶ 111. Frequently, Mr. Bland would need to wait in long lines for the food bank or to use food stamps. *Id.*

A deeper look at Mr. Bland’s childhood yields an even darker picture and it would be an understatement to describe his home life as merely chaotic. His grandmother was an alcoholic schizophrenic and was abusive towards his grandfather. *Id.* Mr. Bland’s father, a gang member, did not live with him and was in and out of prison for much of his childhood. PSR at ¶ 110; Ltr. of Patsy Armstrong, Ex. 1 (“Tony wasn’t dealt the easiest cards in life. Tony was abandoned as a young boy, had a mother on drugs and a father in and out of jail”). Mr. Bland’s earliest memory of his father was of the police chasing him through his own home. PSR at ¶ 110. And when his parents were in his house together, Mr. Bland’s father was both physically and verbally abusive towards his mother. PSR at ¶ 112. In such a small house, there was nowhere for him to hide while this violence occurred.

Later, when his grandmother passed away, Mr. Bland left his grandparents’ tiny home to live with his aunt, Joyce Bland Gresham, in South-Central, Los Angeles. PSR at ¶ 113; *see* Letter of Joyce Bland Gresham, attached as Exhibit 4 (“Tony came to live with me and my husband Bobby after he finished middle school and we raised him just like our son”). While his financial situation improved somewhat and the family lived in a two bedroom apartment, they relied on the food bank for support and the home was still very crowded. PSR at ¶ 113; Letter of Bobby Gresham, attached as Exhibit 5 (“didn’t have much when he was growing up”).

Several friends and family members recounted this extraordinarily difficult childhood in their letters to the Court, with many highlighting their surprise that he has always maintained a “positive outlook[] on life” despite “coming from a broken home in one of the roughest parts of

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Los Angeles.” See e.g., Letter of Jason Offer, attached as Exhibit 6. As Art Kelly observes in his letter: “coming from an impoverished family with adults that [were] not always around, it can be hard to see the light or even know what it looks like to make childhood dreams a reality.” Letter of Art Kelly, attached as Exhibit 7. Indeed, Mr. Bland’s ability to rise above his troubled upbringing and attend college has been inspirational to others. Id. (“He was the first in our immediate family to attend and graduate college. He gave hope to a younger generation who didn’t think it was possible”).

Mr. Bland’s former agent and longtime friend, David Lee, perhaps best summarizes the struggles encountered by the defendant during his childhood – and his efforts create a better future for himself:

Tony had an extremely difficult upbringing. He grew up in an unstable and dangerous environment in some of the poorest neighborhoods of Los Angeles, California. His father was in prison for most of his life. His mother has been addicted to drugs and has never been a part of his life. He had a half-brother who was killed. Tony has told us that there were periods in his childhood where he searched for sustenance by rummaging through trash and shelter, at times, was a luxury.

February 13, 2019 Letter of David Lee, Esq., attached as Exhibit 8 (emphasis supplied).

“Despite his tragic upbringing,” Mr. Lee continues, Mr. Bland worked hard to break free from this extreme poverty by attending college and developing his talent as a basketball player, a career that abruptly ended after years of work when he injured his knee:

Tony fought to make a better life for himself and his family. His high school coaches took him under their wings and were mentors. Having overcome the many hurdles of his childhood, Tony started college at Syracuse University and then transferred to San Diego State University where his talent for basketball blossomed. He played professional basketball overseas for a few years and would have most likely have had an opportunity to play in the NBA but for having the misfortune of sustaining a knee injury which hampered his ability to play at that level and, as such, dashed any hopes he had to play in the NBA.

Id. (emphasis supplied).

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Regardless of this setback, Mr. Bland charged forward. “He was able to set new goals for himself ... completed his bachelor’s degree and advanced from being a trainer to an assistant college coach at two different universities. ... [T]he result of talent, determination and hard work.” Id.; see also Ltr. of Jason Offer, Ex. 6 (“While the odds were stacked against him in life to succeed, he defied the odds by staying out of trouble and focusing on education and sports, which led to him earning a college degree and a career as a coach”). Upon receiving his degree, Mr. Bland “leveraged his experiences” and embarked on a successful coaching career which ended shortly after he was charged in this case. Ltr. of Patsy Armstrong, Ex. 1. Ms. Armstrong describes:

The skills he gained throughout his college and post-graduate experience helped him coach the game he loves so much but more importantly positively impact the lives of many young men (specifically African-American males). Often these young men came from very similar backgrounds as him, with the same hopes, goals, and dreams. Throughout his career, I witnessed the genuine love and care Tony had for his players and their families. He cared for them as student-athletes but above all, as young men that could and would make great contributions to society, despite how their journeys may have started. Tony always encouraged them to be the best they could be on and off the court, with or without the jersey. That’s what makes Tony special in so many ways, he truly cares for the well being and success of others.

Id. (emphasis supplied).

A Family Man Above All Else

Growing up with little stability and almost no parental oversight, Mr. Bland has embraced the opportunity to become the opposite – an active and involved father – with nearly every submitted letter providing some comment on his limitless devotion to his wife and four children. See, e.g., March 10, 2019 Letter of Amber Graham, attached as Exhibit 9 (“he has lead by example as a parent”); Ltr. of Bobby Gresham, Ex. 5 (“a great father to his children who love him dearly”).

For example, Friend Sean Sims writes “[i]n the time that I have known Tony, I have seen nothing but a dedicated husband [and] loving father[,] [who] coaches multiple sports teams for his two younger sons (basketball, soccer, flag football) and continues to mentor his eldest son, who recently got an offer to attend Princeton” March 11, 2019 Letter of Sean Sims, attached as Exhibit 10; see also Letter of Eilise Sharkey, attached as Exhibit 11 (“Tony

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demonstrates his hard work through his commitment to his family, and most of all, his own kids”). Chanda Simon similarly has observed that he is a “dedicated husband and father (March 8, 2019 Letter of Chanda Simon, attached as Exhibit 12) and friend Amber Graham praises: “I have ... witnessed him creating positive and loving environments, focusing on education, and achievement of goals. He is a true man of action, not just words” Ltr. of Amber Graham, Ex. 9; see also Ltr. of Jason Offer, Ex. 6 (“I have watched Tony grow into an amazing family man, he has done a wonderful job raising his children”).

Patsy Armstrong, the mother of Mr. Bland’s eldest child, explains his commitment to their son and his efforts to remain involved in his life even after her relationship with the defendant ended:

Tony has many accomplishments in the world of basketball, however, his greatest accomplishment to me has been the active role he’s played as a father to our son. Tony was self-taught in many aspects of his life, including becoming a father. Growing up without a father-figure, Tony always made our son a priority and did his best to be a great father. Tony and [AB’s] relationship is like no other. Our son is smart, athletic, and extremely kind. He is a kid that will get out his car and help an elder across the street. He is a kid that will defend and protect kids that are bullied. [AB] is currently a junior with a 4.25 GPA, scored a 31 on his ACT, and recently committed to play football at Princeton University (we will be Ivy parents), but even with all his great academic and athletic accomplishments it is his heart which makes him a special human being. I tell people all the time I get the credit for his academics and athleticism, but his heart and kindness comes from his dad.

Ltr. of Patsy Armstrong, Ex. 1 (emphasis supplied); see also March 11, 2019 Letter of Shakoya Green, attached as Exhibit 13 (“I have had the opportunity to watch Tony grow and mature from a young man to a ... husband and family man and it warms my heart to see him with his children”); Ltr. of Joyce Bland Gresham, Ex. 1 (“He’s a great father and husband. He raises his children with love and teaches them right from wrong”).

Cousin Art Kelly has also witnessed firsthand Mr. Bland’s dedication to his children and extended family, noting:

[His] children depend upon their father emotionally, financially and spiritually. He has a positive bond with each one of them as

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well as with his extended family members' children. He has been gratefully giving his time to 20-30 kids every week helping with homework, family values and sports training after school. My own kids look forward to seeing their 'Uncle Tony' as he shows them new techniques with basketball and hearing the things he has to say to them. Tony builds their spirit and self-esteem up by just being him with his positive motivation and love for kids.

Ltr. of Art Kelly, Ex. 7 (emphasis supplied).

Finally, longtime friend David Lee, who has "watched [Mr. Bland] become a responsible and loving husband and father," provides a particularly poignant example of his parenting style that Mr. Lee believes "speaks volumes" as to his character:

Tony's oldest son, [AB], is an extremely talented athlete. Having been raised by a 'basketball father' and blessed with his father's natural athletic ability, [AB] excelled in basketball. A few years ago in a high school game, [AB] scored 21 points for his team in the first half. When his coach took him out to rest, Tony noticed his son appeared unhappy on the bench. At half-time Tony asked his son what was wrong. [AB] responded, "I don't enjoy basketball." Tony told him to finish the game, complete his responsibilities to his team and teammates and then he didn't need to play basketball if he wasn't enjoying it. Despite the fact that [AB] would have most likely had a promising career in basketball, Tony only wanted his son to be happy and live a life of his own choosing which was not what Tony had envisioned for him. It amazed me that as a parent, Tony had the ability to not only recognize his son's strife, but to be supportive in a way that might have been difficult for most parents. As of now [AB] is in the process of deciding scholarship offers from Stanford, Princeton, Cornell, Harvard and Yale. I believe that Tony's influence as a father had some bearing on his son's academic success.

Ltr. of David Lee, Ex. 8 (emphasis supplied).

A Dependable Friend and Positive Role Model

Friends and family members have universally hailed the support that they have received from Mr. Bland, who has been positioned as a role model for them and many of their children.

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See, e.g., March 10, 2019 Letter of Brittany Gilmore, attached as Exhibit 14 (“Tony Bland has been a critical piece to the development of my son. ... Not only in his profession and teachings, but in his everyday life as being a dependable, hardworking, compassionate human being”); Ltr. of Eilise Sharkey, Ex. 11 (“nothing short of the man I hope my two sons turn out to be exactly like one day”).

To begin, cousin Amir Gresham informs the Court that Mr. Bland “imbued [him] with wisdom, and ingrained in [him] a willingness to persevere amidst the many challenges throughout his life.” Ltr. of Amir Gresham, Ex. 3. Specifically, Mr. Gresham recalls: “Tony got me into Westchester High. Graduating years apart, I watched as he pursued his dreams of attending a university and entering the NBA. Influenced by his accomplishments, I ... graduated from college with a degree in audio engineering. A passion that is my life still today.” Id. Amir’s mother, Joyce Bland Gresham, confirms: “Tony has always been a positive role model for my son ... Tony got Amir interested in sports, and Amir played basketball, football, and ran track because of Tony” Further, Ms. Gresham notes: “Tony would always keep an eye on [him] and what [he] was doing making sure [he] kept out of trouble. He would talk to [him] when [he] had problems and give [him] good advice” Ltr. of Joyce Bland Gresham, Ex. 1.

Dr. Brenda Henry-Offor, the mother of college friend Jason Offer, similarly praises the assistance that she received from Mr. Bland by way of her younger son, Timothy:

When my son, Timothy, moved to Los Angeles to attend the University of Southern California, it is Tony who volunteered to take him around to look at apartments and purchase his used car. Tony treats Timothy as his younger brother and continues to look out for him even though Timothy is now an adult. Tony has always been kind and generous. I remember him taking Timothy to his music lessons on Fridays whenever he visited us in NYC. Timothy loved it because he liked hanging out with Jason’s ball playing friends. ... In all honesty, I refer to Tony as my son. He is a good, decent man.

Ltr. of Dr. Brenda Henry-Offor, Ex. 2 (emphasis supplied); see also Letter of Barry Randy Offor, attached as Exhibit 15 (“From day one, Tony has always been a genuine person, a good person who has always been a true friend who has been there for others when they needed it”).

Timothy Offor corroborates his mother’s account of Mr. Bland’s frequent assistance in his letter to the Court:

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When I moved to Los Angeles six years ago to attend graduate school at University of Southern California's school of cinematic arts, Tony went out of his way to make sure that I was well taken care of from finding housing to my general safety, health and well being. He's always been an older brother, someone that always picks up my call and gives me ... advice

March 11, 2019 Letter of Timothy Offer, attached as Exhibit 16; see also March 8, 2019 Letter of Ed Azzam, attached as Exhibit 17 ("a big brother ... for my own children"). Similarly, in his letter to the Court, Jason Offer recalls Mr. Bland's "generosity even when he had nothing." Ltr. of Jason Offer, Ex. 6. Specifically:

Tony literally lived by the saying what is mine is yours; if Tony had an outfit I mentioned to him that I liked he would go out of his way to let me know I can wear it anytime I pleased. Tony is beyond generous; to this day, if Tony had an apple and it is all he had he would cut it into pieces to make sure everyone around him ate. I have never once traveled to Los Angeles and he has not insisted on picking me up from the airport and offering his home for me to stay in, and he has offered the same generosity to members of my family.

Id. (emphasis supplied).

Further, Mr. Bland's good nature as demonstrated in these letters appears to have manifested itself early on in his life. His aunt, Joyce, explains in her letter to the Court how "as a young man, Tony always looked out for his friends, even though he didn't have much money growing up." Ltr. of Joyce Bland Gresham, Ex. Specifically, Ms. Gresham recalls:

Sometimes he would help a friend who was having troubles at home. Tony would let them come and stay over our house for short period of time until they were able to straighten out their problems, and we allowed it because we trusted Tony's judgment, and his ability to make the good decisions. He's always been a good and considerate friend to many.

Id. (emphasis supplied). Mr. Bland's uncle, Bobby Gresham, echoes this sentiment, noting: "when he was growing up he still tried to help others who even less fortunate than him. He was always bringing friends home with him to stay with us for a few days or sometimes weeks

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because they were having issues at home and he wanted to help them.” Ltr. of Bobby Gresham, Ex. 5.

In addition to the foregoing, the submitted letters also praise Mr. Bland as a reliable friend in times of need. Shakoya Green recalls that when she had a medical procedure some years ago and “not having anyone to take [her] and pick [her] up,” that “Tony happened to call [her] to see what [she] was doing and when [she] told him he came right away.” Ltr. of Shakoya Green, Ex. 13. Similarly, Chanda Simon informs the Court that when her son became very ill, Mr. Bland would call to check on them “daily” and “even brought by food and an [aroma therapy candle].” Ltr. of Chanda Simon, Ex. 12.

Of the assistance she received from Mr. Bland throughout her life, Amber Graham writes:

He is a huge part of my village and supports me when I fall short. Tony has always been a role model that I have looked up to, and his qualities of being a hard worker, team player, optimist, and always putting others before himself I feel have bettered me today as a person. Tony possess the qualities of being resilient, selfless, and most of all, caring. Tony has also played a huge impact in my daughter’s life as well. Tony has been a consistent presence for my daughter and I. Without any doubt, I would’t be able to get up and teach moderate to severely disabled preschool aged students, without Tony’s willingness to lend a hand as needed. Tony has done a variety of things for my daughter, too many to name, and asked for nothing in return from me. From taking my daughter to her Father Daughter Dance, homework help, encouraging her, attending school activities, and supporting her extracurricular activities. Considering my daughter doesn’t know her biological father, Tony has taken the time to love her unconditionally.

Had it not been for some of the life lessons Tony has taught me, more than likely I would have settled on mediocrity from myself. When things were tough for me, Tony took time and was willing to convince and persuade me to see the better parts of myself. He convinced me to invest in myself, and my education. Because of his words, I have been a better mother and provider. This is a huge life lesson that Tony taught me, and has enabled me to help others in our community without ever asking for anything in return.

Ltr. of Amber Graham, Ex. 9.

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Describing Mr. Bland as the kind of person she can count on with “any type of hardship,” and will “lend[] his support in any way possible,” Charlotte Armstrong also provides a detailed account of the defendant’s efforts to assist her, especially with the raising of her son:

Although there are so many positive and impactful instances I have had with Tony, the most recent instance which touched my heart consisted of an entire season which just passed. My son at 12 years old, had the pleasure of playing his first season of tackle football. Although exciting there also came some nervousness from both my son and I being that this was his first go round at contact football. I shared our concerns with Tony and he made a vow to support my son to help make his first experience a great one and told me not to worry. Tony went to supreme measures to make it to my son’s practices, which by his presence alone made it known to the coaches to think twice before they even thought about treating him any kind of way. Tony made sure he got his first pair of cleats, went to his games and even showed up to training sessions that were scheduled outside of football practice and when he couldn’t make it, he made sure he called to check on him. My son ended up having a wonderful season with scoring at least 1-2 touchdowns per game. By the end of the season I was able to see my son’s confidence had grown at an insurmountable rate and we have Tony to thank for that.

March 10, 2019 Letter of Charlotte Armstrong, attached as Exhibit 18 (emphasis supplied).

Similarly, Eilise Sharkey has benefitted from Mr. Bland’s helpful nature with regard to her two young sons:

Tony has always been humble, a man of his word, and always taught and instilled life lessons to myself and my own sons. In the simple time he has always taken to just put his phone down, engage in conversation, and play. The lost art of simplicities such as: lessons of looking someone in the eye when they are speaking to you, lessons of getting up when you fall down, lessons of not breaking down when times are tough, and more importantly lessons of being a genuine, supportive, empathetic, and kind human being.

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The enthusiasm that Tony offers in just one minute of conversation is infectious, and doesn't even come close to the most contagious ability he has, which is to make everyone he encounters feel important and special. Tony doesn't even probably know and realize how positively impactful his time with my two sons has been, but it is immeasurable in what it has done for their confidence levels, and as a single mom I can never repay him for that.

Ltr. of Eilise Sharkey, Ex. 11 (emphasis supplied); see also March 3, 2019 Letter of Lana Allen, attached as Exhibit 19 ("being a single mother has had its fair share of challenges, but having people in our village like Tony to lean on has proven to be important and critical").

Finally, Bre'ana Thompson furnishes the Court with an account of the aid she received from Mr. Bland after she was kicked out of her home when she became pregnant: "At the age of 17 I became pregnant with my now 12 year old son Kameron Williams (Tony's Godson) and with an upset mother who put me out[.] Tony took me in and told me we would get thru this as a family." Letter of Bre'ana Thompson, attached as Exhibit 20. Later, Mr. Bland came to Ms. Thompson's aid again during another time of need:

About 2 years ago my mother passed away while I was in the midst of finishing my nursing program, and with my son and I living about an hour away from Los Angeles it was hard to complete with a grieving son and no close help. Tony once again came to our rescue while I finished school, he took Kameron and I in his home even while going thru his own personal situation.

Id.; see also March 3, 2019 Letter of Richard Jeter, attached as Exhibit 21 ("Tony has helped guide mew through tough times and continues to be a positive influence in my life").

Charity and Involvement in the Community

In addition to being a reliable and thoughtful friend, many of those who submitted letters wrote of Mr. Bland's efforts to give back to his community, especially by coaching youth sports and providing advice and guidance. See, e.g., Ltr. of Shakoya Green, Ex. 13 ("Tony is from Watts and was raised by his aunt and uncle; he went to college [and] earned his degrees and is now helping young people work through their trauma so that they are able to be successful in life"). As David Lee describes: "Throughout the years Tony has 'paid it forwards,' [and] has been extremely generous with his time by mentoring young kids," adding: "His life experience

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allows him to relate to and gives him credibility with ‘at risk kids.’ I can only speculate that his wisdom and sage advice has helped many kids.” Ltr. of David Lee, Ex. 8.

Chanda Simon echoes Mr. Lee’s praise, noting for the Court her own experiences with Mr. Bland:

I have witnessed him mentor and provide opportunities to young boys in areas of basketball and self-esteem As a reliable member of this community, Tony is essential to the growth and experiences of these young boys as he spends countless days preparing and working with them on a voluntary basis.

Ltr. of Chanda Simon, Ex. 12; see also Ltr. of Amir Gresham, Ex. 3 (“We coach our boys football team in the summer and during the school year Tony leads a basketball skills development program in the neighborhood we grew up in”). Similarly, Charlotte Armstrong writes: “It’s impressive to witness Tony’s continued desire to be a pillar within the community and his continued giving of his time to teach our youth the importance of being hardworking, honest and strong” Ltr. of Charlotte Armstrong, Ex. 18.

Sean Sims hails: “Regardless of the public scrutiny, Tony has risen above it all and continues to give to his community. ... [A]fter being released from his ... coaching position with University of Southern California, he began working for an organization dedicated to teaching and working with probationary youth” Ltr. of Sean Sims, Ex. 10; Ltr. of Ed Azzam, Ex. 17 (“a great ability to relate to young people positively to enable them to accomplish their goals”). Longtime friend Jason Offer echoes: “I admire the man he has become ... as a role model to kids in the community facing the same adversity he faced and overcame.” Ltr. of Jason Offer, Ex. 6. Art Kelly adds: “It makes me proud that even through adversity he still finds time to be with the kids from the same community he was raised in and teaching them what is possible if they try hard enough.” Ltr. of Art Kelly, Ex. 7. On the impact of Ms. Bland’s guilty plea, Mr. Kelly notes that “now he can knowingly teach them (from experience) that it can all be taken away, in the blink of an eye, if you don’t follow the law.” Id.; see also Ltr. of Lana Allen, Ex. 19 (“Tony has chosen to use his life story and this situation ... where he finds himself on the wrong side of the law as a teachable moment”).

Brittany Gilmore’s letter contains similar observations concerning the defendant’s efforts to help youth:

I often think ... the compassion that Tony holds in his heart [is] not only his family and the people who are close to him, but also for young males he mentors striving to follow a dream. I have

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witnessed Tony inspire many young athletes and non-athletes to take on the challenge of attending college, pursue their passion and to follow in the footsteps of many successful people who have done it before them. ... Tony has an incredible gift with speaking to young males. He often reminds them that they are not a product of their mistakes or the ones they will encounter. But that their true character lies with their integrity in how they respond and accepting accountability. He is open and honest about his experiences and is able to speak and guide young boys and teens from a level of experience.

Ltr. of Brittany Gilmore, Ex. 14. Richard Jeter Likewise praises Mr. Bland's "passion for helping under privileged, young people from Los Angeles," noting: "Tony always finds time to give back to his hometown by motoring young people to use education and hard work to elevate their current situation," and further that he "recently ... used small basketball training sessions to help build sportsmanship, skill and work ethic for elementary aged kids in his community." Ltr. of Richard Jeter, Ex. 21; see also March 13, 2019 Letter of O'dell Pride, attached as Exhibit 22 ("possesses the character and judgment for the betterment of our community").

Joyce Bland Gresham recalls for the Court her experiences with Mr. Bland giving back to the community:

His wife Tasia has a few girlfriends that are single parents so Tony acts as a father figure and role model to their children, he looks out for them and protects them, when there around him, and he looks out for the moms and shows them respect, with their permission, he give their children fatherly advise, and sometimes a place to stay when necessary. Tony coaches a basketball team. He teaches all the team members positive things and he leads by being a good role model and a good example for his children and all the others.

Ltr. of Joyce Bland Gresham, Ex. 4; see also Ltr. of Eilise Sharkey, Ex. 11 ("Tony has joined support walks for a mutual friend's daughter who has epilepsy, (not just donated money), come to weekend birthday parties at Disneyland and participated in all of the festivities during a very emotionally low time ... [and has] gone to father daughter dances for some without present fathers").

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Remorse

Finally, many of those who submitted letters on behalf of Mr. Bland note the sincere remorse and regret that he has expressed for his criminal conduct. See, e.g., Ltr. of Chanda Simon, Ex. 12 (“Tony has expressed to me the serious lack of judgment he exhibited and expressed both remorse and a strong desire to address the personal issues at the hear of the matter”); Ltr. of Art Kelly, Ex. 7 (“I know he regrets the mistake he has made”). Sean Sims has “spoke[n] to [Mr. Bland] at length regarding the circumstances surrounding the indictment,” and it is “evident that his contrition is genuine” Ltr. of Sean Sims, Ex. 10. Charlotte Armstrong similarly notes: “I have been gifted to be able to tell when someone is being sincere in their desire to learn from their missteps or to account for wrongdoing and I am certain that this is the case with Tony Bland.” Ltr. of Charlotte Armstrong, Ex. 18; see also Ltr. of Eilise Sharkey, Ex. 11 (“Tony has owned his wrongs”).

Barry Ofor confirms: “I can personally tell you how remorseful he is for his part in the scandal. He recognizes how his actions have hurt his family, friends, the university, NCAA and the young athletes that were involved.” Ltr. of Barry Ofor, Ex. 15; see also Ltr. of Jason Offer, Ex. 6 (“he is remorseful for what he has done”). And former teacher Ed Azzam observes in his letter: “His life has been forever changed and as we have talked, I can see the maturity this experience has caused him to accept.” Ltr. of Ed Azzam, Ex. 17; see also Ltr. of Brittany Gilmore, Ex. 14 (“Tony made a grave mistake[,] a mistake I know he wholeheartedly regrets”).


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D. CONCLUSION

Defendant Tony Bland comes before this Court asking for mercy. A life filled with extraordinary good deeds, overcoming a bleak childhood and rising above his family's poverty has been marred by his criminal actions. Nevertheless, as the powerful enclosed letters reveal, Mr. Bland is an uncommonly decent and giving man, and unlike many defendants, has made very sincere efforts to help family, friends and members of his community in any way possible throughout his life. He is the rare defendant who has given so much to others – when no one was watching, when he had no need to impress a judge deciding his fate. For these reasons and the others stated herein, a lenient sentence is respectfully requested.

Respectfully submitted,



Jeffrey Lichtman

Encs.

cc: Robert Boone, Esq.
Eli Mark, Esq.
Assistant United States Attorneys (by ECF & hand delivery)